

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

**Louis Dreyfus Company  
7344 SR 15 S  
Claypool, Indiana, 46510**

**ATTENTION:**

**Gilberto Sifuentes  
Plant Manager  
gilberto.sifuentes@ldc.com**

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring Louis Dreyfus Company (“Louis Dreyfus” or “you”) to submit certain information about the facility at 7344 SR 15 S, Claypool, Indiana. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within the time frames specified in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Louis Dreyfus owns and operates an emission source at the Claypool, Indiana facility. We are requesting this information to determine whether your emission source is complying with the Indiana State Implementation Plan and the CAA New Source Review program.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Louis Dreyfus to upload all required information to the secured web-link shared

with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact David Sutlin at [sutlin.david@epa.gov](mailto:sutlin.david@epa.gov) or (312) 353-8990 to make arrangements to submit your response.

Louis Dreyfus must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Louis Dreyfus to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to David Sutlin at  
sutlin.david@epa.gov or (312) 353-8990.

for

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Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance  
Division

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. “Facility” shall mean the facility, including all operations, located at 7344 SR 15 S in Claypool, Indiana.
2. “Volatile Organic Compounds” shall mean any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. 40 CFR § 51.100(s).
3. “Hazardous Air Pollutants” shall mean any of the 189 hazardous air pollutants listed in Title III of the Clean Air Act Amendments of 1990.

## **Appendix B**

### **Information You Are Required to Submit to EPA**

Louis Dreyfus must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. Within 15 calendar days after you receive this request, provide all existing records, including but not limited to reports, documents, spreadsheets, and communications with third parties, related to any volatile organic compounds (VOC) or hazardous air pollutants (HAPs) emission testing conducted for any part of the meal grinding operation and meal storage unit(s) from January 1, 2018 to the present. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. If not explicitly documented in the existing records, then also include at minimum the following information:
  - a. Results of the emission tests in parts per million by volume, pounds per hour, and pounds per ton of soybean processed; and
  - b. A brief description of sampling procedures, including equipment and diagram.
2. Within 15 calendar days after you receive this request, provide copies of any correspondence between Louis Dreyfus and the Indiana Department of Environmental Management (IDEM), since May 2, 2022, that relate to the air emissions investigation and testing of the meal grinding and meal storage operations referenced in Request #1, including discussions of how these investigations and testing efforts affect or may affect the facility's air permits, New Source Review status, or any other applicability under the CAA.
3. Within 15 calendar days after you receive this request, provide records of the quantity of soybeans processed, pursuant to condition D.1.10 (a) of the facility's Title V permit, no. 085-41325-00102, for years 2020 through 2022. Provide the records in the most granular form available (e.g. hourly, daily, monthly, etc).
4. Within 15 calendar days after you receive this request, provide a description of all emissions, including the source(s) of these emissions, that are routed to the AF-6 meal grinding stack.
5. Within 30 calendar days after you receive this request, provide the following supplemental information for each emission test, if known, and if not already provided in the response to Request #1:
  - a. Summary of Results
    - i. Discussion of test errors;
    - ii. Discussion of any EPA standard test methods or modified test methods; followed and deviations from the reference test methods; and

- iii. Production data during the tests (tons per hour).
  - b. Facility Operations
    - i. Description of the operating process(es) being tested;
    - ii. Number of test runs and length of each test run;
    - iii. All periods of operating down time during each test run;
    - iv. Average hourly throughput during each test run;
    - v. Stack outlet gas temperature and outlet flow rate; and
    - vi. Temperature of the meal grinding operation.
  - c. Sampling and Analytical Procedures
    - i. Sampling port location(s) and dimensions of cross-section;
    - ii. Sampling point description, including labeling system;
    - iii. Brief description of analytical procedures, including calibration; and
    - iv. Quality control/quality assurance procedures, tests and results.
- 6. Within 30 calendar days after you receive this request, provide copies of all annual emissions reports submitted to IDEM for the facility from 2018 to the present, and include:
  - a. A narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used;
  - b. Any documents outlining procedures for calculating annual emissions; and
  - c. Any electronic spreadsheets containing calculations.
- 7. Within 30 calendar days after you receive this request, for the meal grinding process, provide the average and maximum:
  - a. Operating temperature (or best estimate, if unknown);
  - b. Amount of meal processed per hour;
  - c. Residence time in the process; and
  - d. Injection rate(s) of any substances including but not limited to water, chemicals, or other additives.
- 8. Within 30 calendar days after you receive this request, provide the following information for meal storage:
  - a. Frequency of loadout;
  - b. Type and description of each storage unit (silo, fixed-roof tank, etc);
  - c. Capacity and actual maximum amount of meal stored in each storage unit;
  - d. Whether each storage unit is normally vented to atmosphere or is equipped with a pressure relief valve; and
  - e. If equipped with a pressure relief valve, indicate if the valve is routinely checked to see if it is open.

9. Within 30 calendar days after you receive this request, provide the latest version of your written plan for demonstrating compliance with 40 C.F.R. Subpart GGGG, as required by 40 C.F.R. § 63.2851(a).
10. Within 30 calendar days after you receive this request, unless included in the response to Request #6, provide the complete set of calculations, in electronic spreadsheet form, for determining the monthly records of hazardous air pollutant (HAP) loss and compliance ratio, pursuant to the requirements of 40 C.F.R. Subpart GGGG, since January 1, 2022.